



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 1, 2018

BY CM/ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

SO ORDERED:

[Signature]
HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Re: *United States v. Pizarro & Rivera*, S4 17 Cr. 151 (AJN)

Dear Judge Nathan:

The Government writes to respectfully request a brief extension of time to respond to defendant Robert Pizarro's motion for bail (*see* Dkt. No. 145, filed on May 29, 2018). At the May 21, 2018 conference, the Court provided the Government with 7 days in which to respond to that motion; thus, the Government's response currently is due on June 4, 2018. The Government is respectfully seeking an additional 7 days, until June 11, 2018, to file its opposition.

The Government is making this request because, since the May 21 conference, the Government has continued combing through its files to identify any additional materials for defense review. The Government has been preparing a production to the defendants of those materials. In addition, yesterday the defense filed a supplemental motion requesting additional materials and information from the Government. (*See* Dkt. No. 146).

Under the circumstances—and, in particular, given that Pizarro's motion for bail argues that the weight of the evidence has been "significantly reduced" in light of the information already provided by the Government—the Government submits that the Government's answering brief and the defense's reply brief should be filed after the Government production (both in response to the defense's supplemental motion and any with additional materials identified by the Government).

6/1/18

SO ORDERED

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Prior to making this request, the Government requested defense counsel's consent, and counsel has advised that they consent to this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: _____/s/_____
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cc: All counsel of record